



201-15663

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

SEP 09 2004

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Linda M. Clark  
Manager, Product Regulatory Affairs  
FMC Corporation  
1735 Market Street  
Philadelphia, PA 19103

Dear Ms. Clark:

Thank you for your letter dated November 9, 1998, to the U.S. Environmental Protection Agency (EPA), regarding the High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to your request.

Your letter states that Dibutyl ether (CAS No. 142-96-1) is an impurity in your product, tributyl phosphate and it is not manufactured for commercial purposes and should therefore be removed from any testing requirements. Your letter also states that Coal (CAS No. 65996-77-2), falls within the TSCA definition of a naturally occurring substance and should not have been reported for the IUR and should not be included on the HPV List and that FMC no longer owns the coal mine that had been the source of the ore which was erroneously reported. Finally, your letter lists four chemicals which you no longer import.

Dibutyl ether (CAS No. 142-96-1) is claimed as an impurity in your product. EPA's records show that this chemical has been reported to the Inventory Update Rule at HPV production levels for the years 1998 and 2002 and that it is a sponsored chemical as well. EPA also recognizes that manufacturing processes differ among companies, and, therefore, encourages you to amend your reporting under the IUR if you believe Dibutyl ether (CAS No. 142-96-1) is an impurity, as that term is defined under 40 CFR 710.2(m).

Your letter states that coal (CAS No. 65996-77-2), falls within the TSCA definition of a naturally occurring substance. EPA agrees, and the HPV Chemical List has been annotated to show a "3" for this chemical to indicate that it is not subject to the HPV Challenge Program because it is a polymer or inorganic substance.

Your letter mentions that FMC no longer manufactures or imports Benzene, 1-chloro-2-(chloromethyl)- (CAS No. 611-19-8), Sodium methoxide (CAS No. 124-41-4), Pyrocatechol (CAS No. 120-80-9), and 2-Buten-1-ol, 3-methyl- (CAS No. 556-82-1). The Agency has

received several letters from companies who state that they no longer manufacture or import HPV chemicals for which they filed reports under the 1990 IUR and which are consequently included on the HPV Challenge Program Chemical List. The Agency will post all such letters on the Chemical Right-to-Know (ChemRTK) website ([www.epa.gov/chemrtk](http://www.epa.gov/chemrtk)) so that the general public and other interested stakeholders may see that a specific company is no longer associated with the manufacture or importation of a specific chemical.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

Sincerely,

Wardner G. Penberthy  
Acting Director  
Chemical Control Division

cc: AR201